Tenneco 1010 Milam Street PO Box 2511 Houston, Texas 77252 2511

Tel 713 757 2131 Laurent B. Webb

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August 2, 1996

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Damaris Cristiano Asst. Regional Counsel U. S. Environmental Protection Agency 26 Federal Plaza New York, NY 10278

RE: SCP/CARLSTADT SITE DE MINIMIS AGREEMENT

Dear Ms. Cristiano:

This letter is to inform you that Tenneco Polymers Inc. (Tenneco) desires to be included in the SCP/Carlstadt site de minimis settlement agreement. The de minimis amount for Tenneco (as derived by the PRP Group investigations) will be 14,250 gallons. This number was arrived at by the addition of 6,750 gallons which existing invoices (see Attachment 1) state went to the site (EPA used 6,800 gallons in their waste-in list), and one-half of the amount, i.e., 15,000 gallons, shown on some other less rigorous documents (see Attachment 2) which only possibly went to the site. Thus, the PRP Group deemed Tenneco's share to be 6,750 gallons plus 7,500 gallons (one-half of 15,000 gallons), or 14,250 gallons.

Further, for your information, the assets of Tenneco Chemicals, Inc. were sold beginning in 1982, and the corporation was dissolved and liquidated in 1988. There is no successor to Tenneco Chemicals, Inc. However, for administrative purposes we prefer to show Tenneco Polymers Inc. as the settling entity.

We appreciate EPA's cooperation in this site. If you have any questions or need further information, please contact our outside counsel, Ms. Sara Beth Watson at (202) 429-8064.

Sincerely,

Laurent B. Webb

Attorney

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I certify that the above information is correct to the best of my knowledge.  Date 10-11-7 P Signature and Title Signature and Title Signature and Title Signature and Title Signature Section II to BE COMPLETED BY THE SPECIAL WASTE HAULER  Section II to BE COMPLETED BY THE SPECIAL WASTE HAULER  Section III to BE COMPLETED BY THE SPECIAL WASTE HAULER  Section III to BE COMPLETED BY THE SPECIAL WASTE HAULER  Name of Hauler  I certify that the described quantity of material (a) listed in Section I was hauled by me to the Special Waste Facility named in Section I  Section IV to BE COMPLETED BY THE SPECIAL WASTE FACILITY  Section IV to BE COMPLETED BY THE SPECIAL WASTE FACILITY  Address Jile Facility  Registration Number (DAUIA)  Date Waste Received (10) All III  Lecrify that the hauler stated above delivered the waste described in Section I to this Facility.	28.					+-	1	
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SECTION II TO BE COMPLETED BY THE SPECIAL WASTE HAULER  I certify that the described quantity of material (3) listed in Section I was collected by me.  SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER  SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER  Name of Hauler  I certify that the described quantity of material (4) listed in Section I was hauled by me to the Special Waste Facility  Name of Facility  SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE FACILITY  Address 216 following Plank  Name of Facility  Name of Facility  Name of Facility  Date Waste Received 10 A1 A1 ACCEPTED Rejected  I certify that the hauler stated above delivered the waste described in Section I to this Facility.	l						11	
SECTION II TO BE COMPLETED BY THE SPECIAL WASTE HAULER  I certify that the described quantity of material (3) listed in Section I was collected by me.  SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER  SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER  Name of Hauler  I certify that the described quantity of material (4) listed in Section I was hauled by me to the Special Waste Facility  Name of Facility  SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE FACILITY  Address 216 following Plank  Name of Facility  Name of Facility  Name of Facility  Date Waste Received 10 A1 A1 ACCEPTED Rejected  I certify that the hauler stated above delivered the waste described in Section I to this Facility.	I certify that the above information is cor	rect to 1	the p	Tr of	Shipping H.	GK.	11	
SECTION II TO BE COMPLETED BY THE SPECIAL WASTE HAULER  I certify that the described quantity of material (3) listed in Section I was collected by me.  Date Date Date Date Date Date Date Date	Date 10-11-78 Signature and	11110						
Certify that the described quantity of materia (3) listed in Section I was confected by me to the Special Waste Hauler   Section III TO BE COMPLETED BY THE SPECIAL WASTE HAULER   Name of Hauler   Lerify that the described quantity of material (4) listed in Section I was hauled by me to the Special Waste Facility   Name of Facility   Section I to this Facility   Section I to this Facility   Name of Facility   Date Waste Received   O   A   A   A   A   A   A   A   A   A		25 0014	DI ET	ED R	THE SPECIAL WASTE HAULER			
Name of Hauler  SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE HAULER  Name of Hauler  Lecrify that the described quantity of material (a) listed in Section I was Hauled by me to the Special Waste Facility  Name of Facility  SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE FACILITY  Name of Facility  Name of Facility  Registration Number (A) (A) Date Waste Received (A)	SECTION II TO					-		
Name of Hauler  SECTION III TO BE COMPLETED BY THE SPECIAL WASTE HAULER  Name of Hauler  Lecrify that the described quantity of material (c) listed in Section I was fisuled by me to the Special Waste Facility  Name of Facility  SECTION IV TO BE COMPLETED BY THE SPECIAL WASTE FACILITY  Name of Facility  Name of Facility  Registration Number (DICIAL A)  Date Waste Received (O) (A) (7) (8) (A) (A) (A) (A) (A) (A) (A) (A) (A) (A	I certify that the described quantity of mai		, 15 (C	سر	Vehicle License Plate Number	M	D KATHPI a/J	
Name of Hauler  Lectify that the described quantity of material (s) listed in Section I was hauled by me to the Special Waste Facility  Name of Facility  Name of Facility  Registration Number Date Waste Received 101 A1 A18  Lectify that the hauler stated above delivered the waste described in Section I to this Facility.	Data HO /// X Monature							
Name of Hauler  Lectify that the described quantity of material (s) listed in Section I was hauled by me to the Special Waste Facility  Name of Facility  Name of Facility  Registration Number Date Waste Received 101 A1 A18  Lectify that the hauler stated above delivered the waste described in Section I to this Facility.	SECTION ILL TO	BECOM	PLET	ED B	Addres 1/ // Lill Con /	VZ	NOWAK NI	
Name of Facility  Name of Faci	Name of Hauler Address 1 / W/65 / What Facility							
Name of Facility  Name of Faci	I certify that the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of material (9) listed in Section 1 was nauted by interest of the described quantity of the described quantity of the described quantity of the described particles (1) and the described quantity of the described particles (1) and							
SECTION IN TO BE COMPLETED BY THE SPECIAL WASTE FACILITY  Name of Facility  Section In The Beautiful Address 216 flagran flack fl.  Registration Number (2) (1) A Date Waste Received (0) (1) (18) (18) (18) (18) (18) (18) (18)	named in section 1							
Name of Facility	DATE OF THE SPECIAL WASTE FACILITY							
Name of Facility  Registration Number (A) (Date Waste Received 10) (A) (The Accepted Rejected Rejected Rejected I certify that the hauler stated above delivered the waste described in Section I to this Facility.								
Registration Number (0305 A) Date waste Received.  1 certify that the hauler stated above delivered the waste described in Section I to this Facility.	Name of Facility Accepted Rejected							
I certify that the hauler stated above delivered the	Registration Number विभागाति Dat	e waste	KCCC	م بالجون م	cribed in Section I to this Facility		•	
Signature and Title March 12 area 12	I certify that the hauter stated above define	erea the	# #3 (	r nes				
Date /a /1-7 > Signature and the	Date / 2 Signa	ture and	Titl	<u>( }</u>	Track Bone	23	eng.	

## ATTACHMENT 2

## PRELIMINARY LISTING OF SHIPMENTS FROM SCP-CARLSTADT PRP QUESTIONNAIRE RESPONSE SUBMITTED BY TENNECO POLYMERS ( PRP NUMBER 720102 )

CLEAN SITES, INC. 01/29/91

TRANSACTION NUMBER	DATE FAC # TRANSPORTER OTHER INFORMATIO	SHIPMENT FORM & NUMBER DN:	AMOUNT(S)	BELIEVED RECEIVED AT SCP CARLSTADT?	TRANSACTION INVOLVES	MATERIAL GENERAL DESCRIPTION MATERIAL CHEMICAL DESCRIPTION	KNOWN TO CONTAIN PCBS?
		•	•				
1	11/02/70 001	1 TANK TRUCK	5,000 GALLONS	UNKNOWN		SOLVENT FOR RECOVERY	
	(#101) GALAXIE CHEM	IICALS, INC.				DIMETHYL FORMAMIDE	NO
						_	NO
2	11/10/70 001	1 TANK TRUCK	5,000 GALLONS	UNKNOWN		SOLVENT FOR RECOVERY	
	(#101) GALAXIE CHEM	IICALS, INC.				DIMETHYL FORMAMIDE	
						DIRETHIE FORMANIDE	NO
3	**/**/** 001		5,000 GALLONS	UNKNOWN	SCP	UNKNOWN	
	(#102) SCIENTIFIC C	HEMICAL PROCESSING, I			00,	,	
		IPMENT ALLEGED BY ECK				UNKNOWN	NO
	COMMENT. INIS SI	TENERI METERED BI ECK	MAKUI SUKVET. UNKN	UWN DAIL IN 1975.			

END OF RECORDS FOR TENNECO POLYMERS

TOTAL NUMBER OF GALLONS BELIEVED BY PARTY TO HAVE GONE TO SCP IS	0
TOTAL NUMBER OF GALLONS NOT BELIEVED BY PARTY TO HAVE GONE TO SCP IS	. 0
TOTAL NUMBER OF GALLONS UNKNOWN BY PARTY TO HAVE GONE TO SCP IS	15,000